

**MILMAN LABUDA LAW GROUP PLLC**

3000 MARCUS AVENUE  
SUITE 3W8  
LAKE SUCCESS, NY 11042

TELEPHONE (516) 328-8899  
FACSIMILE (516) 328-0082

November 13, 2023

**VIA ECF**

United States District Court  
Southern District of New York  
Attn: Hon. Kenneth M. Karas, U.S.D.J.  
300 Quarropas Street, Courtroom 521  
White Plains, NY 10601-4150

**Re: Huerta, et al. v. J.D. Workforce, Inc., et al.**  
**Case No.: 7:23-cv-5382 (KMK) (AEK)**

Dear Judge Karas:

This office represents the Defendants J.D. Workforce, Inc., Hamwattie Bissoon, and Steven Deane (collectively hereinafter the “Defendants”) in the above-referenced case. See ECF Docket Entry 21. Defendants write, with the consent of all parties, to respectfully an adjournment of the pre-motion conference currently scheduled to proceed on Wednesday, November 15, 2023 because your undersigned will be defending an all-day in-person deposition at his office in an unrelated state court action.

Pursuant to ¶ I(C) of this Court’s Individual Rules of Practice, Defendants respectfully submit that: (i) the original appearance date is referenced in the preceding paragraph; (ii-iii) there have been no previous requests for an adjournment of this conference; and (iv) all other parties consent to this request. Your undersigned was unable to earlier make this request due to preparation for a hearing before the New York State Industrial Board of Appeals occurring today and being out ill on Friday, November 10, 2023. As such, good cause and excusable neglect exists for this Court to exercise its discretion in favor of granting the requested adjournment. See Fed. R. Civ. P. 6(b)(1)(B). Defendants thank this Court for its time and attention to this case, and apologize for not earlier submitting this request for an adjournment.

Dated: Lake Success, New York  
November 13, 2023

Respectfully submitted,  
**MILMAN LABUDA LAW GROUP PLLC**  
/s/ Emanuel Kataev, Esq.  
Emanuel Kataev, Esq.  
3000 Marcus Avenue, Suite 3W8  
Lake Success, NY 11042-1073  
(516) 328-8899 (office)  
(516) 303-1395 (direct dial)  
(516) 328-0082 (facsimile)  
emanuel@mllaborlaw.com

*Attorneys for Defendants*  
*J.D. Workforce, Inc.*  
*Hamwattie Bissoon,*  
*and Steven Deane*

**VIA ECF**

Katz Melinger PLLC  
Katherine Morales, Esq.  
370 Lexington Avenue, Suite 1512  
New York, NY 10017-0045  
Telephone: (212) 460-0047  
Facsimile: (212) 428-6811  
kymorales@katzmelinger.com

*Attorneys for Plaintiffs*

*Jose Huerta,  
Vinicio Mera,  
Jose Florez, and  
Elvia Borja*

**VIA ECF**

Allyn & Fortuna LLP  
Attn: Nicholas Fortuna, Esq.  
1010 Avenue of the Americas  
Suite 302  
New York, NY 10018-0023  
nfortuna@allynfortuna.com

*Attorneys for Defendants*

*Marav USA LLC d/b/a Bingo Wholesale  
and David Weiss*